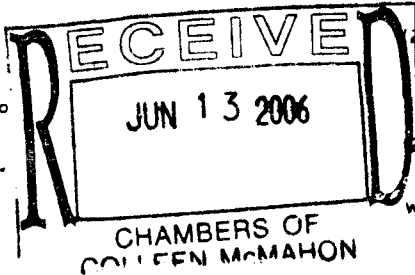


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June 13, 2006

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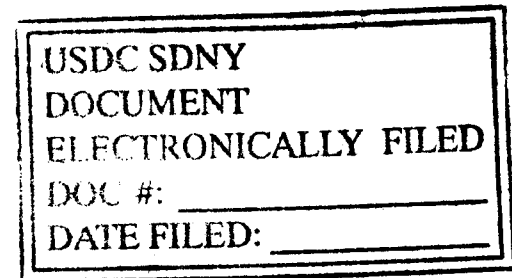
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**BY FACSIMILE**

Honorable Colleen McMahon  
 United States District Judge  
 Southern District of New York  
 300 Quarropas Street, Rm. 533  
 White Plains, New York 10601-4150

Re: United States v. Samuel Israel III, 05 Cr. 1039

Dear Judge McMahon:



This firm represents Samuel Israel III in the above-referenced matter. Mr. Israel is scheduled to be sentenced on September 18, 2006. Currently, his conditions of release permit Mr. Israel to travel within the Southern and Eastern Districts of New York. These conditions were previously modified in May of this year to allow Mr. Israel to attend his son's basketball games in New Jersey.

Mr. Israel would like to travel to Florida twice this summer to visit his parents. Mr. Israel's father is ill and his mother is celebrating her 70<sup>th</sup> birthday in late June. The first trip would be from June 25<sup>th</sup> to June 30<sup>th</sup>, and would allow Mr. Israel to visit with his ailing father and be with his mother on her birthday. Mr. Israel would like to return to Florida in July with his 12-year-old son Jake. Pursuant to Mr. Israel's divorce agreement with his ex-wife, Mr. Israel may take Jake on a ten day vacation during the summer; Mr. Israel's ex-wife will not allow Jake to go to Florida with

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Honorable Colleen McMahon  
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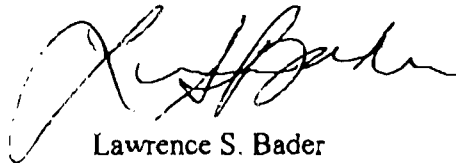
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June 13, 2006

Mr. Israel in June, which is why Mr. Israel would like to visit his parents twice this summer. The second trip would be from July 17<sup>th</sup> to July 26<sup>th</sup>. Both trips will be paid for by Mr. Israel's parents, and Mr. Israel will provide detailed itineraries of the trips to pre-trial services.

By this letter, we ask the Court to modify Mr. Israel's conditions of release to allow him to visit his parents in Florida in June and July of 2006. I have raised this request with AUSAs Perry Carbone and Margery Feinzig, and they have no opposition to this application.

Respectfully submitted,



Lawrence S. Bader

cc: AUSA Perry Carbone  
AUSA Margery Feinzig  
Pretrial Services